

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PHILIPPE BUHANNIC,

Plaintiff,

-against-

SHIBOLETH LLC,

Defendant.

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Case No.: 1:18-cv-05846

**DEFENDANT'S
NOTICE OF MOTION TO TAKE JUDICIAL NOTICE**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, together with the supporting declaration of Joshua Levin Epstein, Esq. (the “**Epstein Decl.**”) and the exhibits annexed thereto, defendant Shibolet LLP, by and through undersigned counsel, will move before the Court, at the United States Courthouse, located at 40 Foley Square, New York, New York, 10007, on a day and time to be set by the Court, for an order that the Court take judicial notice of the documents attached to the Declaration of Joshua D. Levin-Epstein in support of Defendant’s concurrently filed Motion to Dismiss Plaintiff’s Complaint, pursuant to Federal Rule of Evidence 201, and to grant such other and further relief as the Court may deem just and proper.

Dated: New York, New York
October 31, 2018

By: /s/ Joshua Levin-Epstein
Joshua Levin-Epstein, Esq.
Daniel Goldstein, Esq.
Martin Ritholtz, Esq.
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Attorneys for Defendant

Cc: All parties via ECF

Certificate of Service

I hereby certify that on October 31, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the counsel/parties who have registered with this Court.

/s/ Joshua Levin-Epstein